



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

March 3, 2021

VIA CM/ECF

Hon. Christian F. Hummel, U.S. Magistrate Judge
United States District Court, Northern District of New York

Re: *Caballero v New York Department of Corrections and Community Supervision, et al.*, 9:20-CV-1470 (DNH/CFH)

Dear Judge Hummel:

I write at this time to request a postponement of the Initial Conference in the above-referenced matter and a stay of the deadline for the exchange of Mandatory Disclosures pending determination of Defendants' motion to dismiss (Dkt. No. 14) the Complaint (Dkt. No. 1).

This is the first request to postpone these deadlines. The Initial Conference presently is scheduled for March 15, 2021 and the deadline for the exchange of Mandatory Disclosures is March 8, 2021 (Dkt. No. 3). We are seeking to postpone these deadlines in view of the fact that the motion we have filed may dispose of the case which would obviate the need for conferencing and discovery.

I contacted plaintiff's counsel who advised that they do not consent to this request.

Thank you for your consideration.

Respectfully,

Denise P. Buckley

Denise P. Buckley, A.A.G., Bar Roll No. 519278

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